In RE: Andrea Marie Shaul Robert Blain Shaul, Debtors Chapter 7, No. 4:18-bk-04779

### AMENDED APPLICATION TO EMPLOY ATTORNEY

TO THE HONORABLE ROBERT N. OPEL, BANKRUPTCY JUDGE:

The application of Andrea Shaul and Robert Shaul respectfully represents:

- On the 31<sup>st</sup> day of August 2018, applicant was hired to represent Andrea
   Marie Shaul and Robert Blaine Shaul in a Chapter 13 bankruptcy action.
- 2. On the 9<sup>th</sup> of December 2018, applicant was hired to file an adversary action on behalf of Andrea Shaul as listed in the docket above.
- On the 21<sup>st</sup> of August, 2019, this case was converted from a Chapter 13 to a Chapter 7 bankruptcy.
- 4. The professional services that Matthew J. Zeigler, Esquire, is to render are, among others, the following:
  - (a) to handle any and all legal problems which may arise during the course of the adversary proceeding of this bankruptcy matter.
- 4. The proposed billing rate for the attorney for the debtors will be \$200.00 an hour plus costs for services rendered during calendar years 2019 and 2020.
- 5. To the best of applicants' knowledge, Matthew J. Zeigler, Esquire, has no connection with the creditors, or any other party in interest, and represents no interest adverse to the debtors upon which he is to be engaged, and his employment would be in the best interest of the debtors.

WHEREFORE, applicants pray that they be authorized to employ Matthew J.

Zeigler, Esquire, as their attorney under a general retainer.

Respectfully submitted,

/s/ Matthew J. Zeigler

Matthew J. Zeigler, ID # 83367 Attorney for Plaintiff Zeigler & Associates 353 Pine Street, Suite 3 Williamsport, PA 17701 570-599-2211, Fax: 570-599-2209

In RE: Andrea Marie Shaul Robert Blain Shaul, Debtors Chapter 7, No. 4:18-bk-04779

### AFFIDAVIT OF PROPOSED ATTORNEY

COMMONWEALTH OF PENNSYLVANIA

SS

COUNTY OF LYCOMING

I, Matthew J. Zeigler, Esquire, hereby make solemn oath:

- 1. I am an attorney and counselor-at-law duly admitted to practice in the Commonwealth of Pennsylvania, and the United State Bankruptcy Court for the Middle District of Pennsylvania.
- I maintain an office for the practice of law at Zeigler & Associates, LLC, 353 Pine Street, Suite
   Williamsport, PA 17701.
- 3. I have no connection with the Defendants, creditors for the Plaintiffs or any party in interest herein, or his respective attorneys.
- 4. I represent no interest adverse to the Debtor in the matters upon which I am to be engages.

5. I am a disinterested person within Section 101(14) of the Bankruptcy Code.

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Sworn to and subscribed to me this

Of <u>Sept.</u>, 2019

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My commission expires:  $\frac{3}{30}$ 

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL Jennifer L Matthews Loyalsock Twp, Lycoming County My Commission Expires 03/30/2021

In RE: Andrea Marie Shaul

Chapter 7, No. 4:18-bk-04779

Robert Blain Shaul, Debtors

#### **CERTIFICATE OF SERVICE**

I, **Christine G. Zeigler**, paralegal for Attorney Matthew J. Zeigler, attorney for Andrea and Robert Shaul, Debtors, and Andrea Shaul, Plaintiff, do certify that I served a true and correct copy of the foregoing **AMENDED APPLICATION** by depositing a true and correct copy of the same in the United States Mail at Williamsport, Pennsylvania, postage prepaid, first class mail, on September 26, 2019, addressed to the parties on the following 2 pages.

Respectfully Submitted: ZEIGLER & ASSOCIATES LLC Attorney for Debtors

s/Christine G. Zeigler
Christine G. Zeigler, paralegal
For Attorney Matthew J. Zeigler,
Attorney ID: 83367
353 Pine Street, Suite 3
Williamsport, PA 17701
(570) 599-2211,
mjzeigler@comcast.net

### **CREDITOR LIST**

ALLY FINANCIAL 200 RENAISSANCE CTR DETROIT, MI 48243 EDFINANCIAL SERVICES
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DBA AMERICAN STUDENT ASSISTANCE
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ST. PAUL, MN 55116

MILITARY STAR 3911 S WALTON WALKER BLV DALLAS, TX 75236

BLI RENTALS LLC PO BOX 992 EMPORIA, KS 66801

ELAN FINANCIAL SERVICE PO BOX 108 SAINT LOUIS, MO 63166 NAVIENT SOLUTIONS LLC GLHEC AND AFFILIATES PO BOX 8961 MADISON, WI 53708-8961

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FNB OMAHA P.O. BOX 3412 OMAHA, NE 68197 NAVIENT SOLUTIONS LLC EDUCATIONAL CREDIT MGMT CORPORATION LOCKBOX 8682 ST. PAUL, MN 55116-8682

CAPITAL ONE 15000 CAPITAL ONE DR RICHMOND, VA 23238 GARDEN HOMES MANAGEMENT CORPORATION 29 KNAPP ST PO BOX 4401 STAMFORD, CT 06907

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CBNA 50 NORTHWEST POINT ROAD ELK GROVE VILLAGE, IL 60007 GRNSKY/THDLNSVC/FIFTHT PO BOX 71215 CHARLOTTE, NC 28272-1215 PA INCOME TAX - DEPT OF REVENUE PO BOX 280506 HARRISBURG, PA 17128-0506

CHASE CARD PO BOX 15298 WILMINGTON, DE 19850 GUTHRIE/ROBERT PACKER HOSPITAL 1 GUTHRIE SQUARE SAYRE, PA 18840 PORTFOLIO RECOVERY ASSOCIATES Synchrony Bank PO BOX 41067 NORFOLK, VA 23541

DR. ROBERT DRACKER 4811 BUCKLEY ROAD LIVERPOOL, NY 13088 IRS - FEDERAL CENTRALIZED INSOLVENCY OPERATION POST OFFICE BOX 7346 PHILADELPHIA, PA 19101-7346 QUICKEN LOANS 1050 WOODWARD AVE DETROIT, MI 48226

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REALPAGE UTILITY MANAGEMENT 130 SADDLESTONE PLACE CAMILLUS, NY 13031

SUNOCO/CITI PO BOX 6497 SIOUX FALLS, SD 57117 UGI ONE UGI CENTER WILKES BARRE, PA 18711-0600

SALLIE MAE PO BOX 3229 WILMINGTON, DE 19804 TD AUTO FINANCE PO BOX 9223 FARMINGTON HILLS, MI 48333 VERIZON FIOS PO BOX 15124 ALBANY, NY 12212-5124

SEARS/CBNA PO BOX 6283 SIOUX FALLS, SD 57117 TD BANK USA/TARGETCRED PO BOX 673 MINNEAPOLIS, MN 55440 WATERWATCH 67 WAREHOUSE ST ROCHESTER, NY 14608

In RE: Andrea Marie Shaul

Robert Blain Shaul, Debtors

Chapter 7, No. 4:18-bk-04779

**ORDER** 

Upon consideration of the annexed application of Matthew J. Zeigler in the above matter,

praying for authority to employ and appoint Matthew J. Zeigler, Esquire, under a general retainer to

represent as an attorney for the debtors, no adverse interest having been represented, and it further

appearing the Matthew J. Zeigler, Esquire, is an attorney duly admitted to practice in this court, and the

court being satisfied that Matthew J. Zeigler, Esquire, represents no adverse interest as an attorney for

the Debtors in the matters upon which he is to be engaged, that his employment is necessary and would

be in the best interest of the Debtors, and that the case is one justifying the employment of an attorney

under a general retainer, it is

HEREBY ORDERED AND DECREED that the said Matthew J. Zeigler, is hereby authorized to

employ the said Matthew J. Zeigler, Esquire, as attorney under a general retainer.